

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
JENNIFER CABRAL,

Plaintiff(s),

-against-

DOLLAR TREE, INC.

Defendant(s).
-----X

Index No.: 20676/2020E

Date Purchased:

SUMMONS

Plaintiffs designate New York
County as the place of trial.


The basis of venue is:
plaintiff's place of residence

Plaintiffs reside at:
4275 Park Avenue #415
Bronx, NY 10457
County of Bronx

To the above - named Defendant:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
January 9, 2020


TEPERMAN & TEPERMAN, LLC.
Attorneys for Plaintiff
JENNIFER CABRAL
15 East 40th Street, Suite 800
New York, NY 10016
(212) 725-2313

TO:

DOLLAR TREE, INC.
500 Volvo Park Way
Chesapeake, VA 23320

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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JENNIFER CABRAL,

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-against-

DOLLAR TREE, INC.

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VERIFIED COMPLAINT

Plaintiffs, by their attorneys, **TEPERMAN & TEPERMAN, LLC.**, complaining of the Defendant, respectfully allege, upon information and belief:

1. That at all times hereinafter mentioned, Plaintiffs was, and still is, residents of the County of Bronx, State of New York.

2. That this action falls within one or more of the exceptions as set forth in CPLR §1602.

3. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE INC.**, was and still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.

4. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE INC.**, was and still is a foreign corporation duly authorized to do business in the State of New York.

5. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE, INC.**, maintained a principal place of business in 500 Volvo Park Way, Chesapeake, VA 23320 the County of North Hampton, City and State of Virginia.

6. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE, INC.**, owned the premises and appurtenances and fixtures thereto, located at the 925 Hunts Point Avenue, County of Bronx, State of New York.

7. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE INC.**, operated the aforesaid premises.

8. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE INC.**, managed the aforesaid premises.

9. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE INC.**, controlled the aforesaid premises.

10. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE INC.**, maintained the aforesaid premises.

11. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE** repaired the aforesaid premises.

12. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE** entered into a contract/lease with the premises known as 925 Hunts Point Avenue, County of Bronx, City and State of New York.

13. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE, INC.**, owned the premises and appurtenances and fixtures thereto, located at 925 Hunts Point Avenue, County of Bronx, State of New York.

14. That at all times hereinafter mentioned, the Defendant **DOLLAR TREE, INC.**, operated the aforesaid premises.

15. On June 09, 2019, was lawfully and properly a customer on the aforesaid premises.

16. On June 09, 2019, **JENNIFER CABRAL** was lawfully on the aforesaid premises with the knowledge, permission and consent of the owner or owners.

17. On June 09, 2019, while Plaintiff **JENNIFER CABRAL** was lawfully about the aforesaid premises she was caused to struck by a crate fell on her head next to cashier and sustain serious and permanent injuries.

18. That at all times on June 09, 2019, **JENNIFER CABRAL** was lawfully on the aforesaid premises with the knowledge, permission and consent of the owner or owners.

19. On June 09, 2019, while Plaintiff **JENNIFER CABRAL** was lawfully about the aforesaid premises when she was caused to struck by a crate fell on her head and caused her to sustain serious and permanent injuries.

20. The above - mentioned occurrence, and the results thereof, were caused by the joint, several and concurrent negligence of the Defendant and said Defendant's agents, servants, employees and/or licensees in the ownership, operation, management, supervision, maintenance and control of the aforesaid premises.

21. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

22. That by reason of the foregoing, Plaintiff **JENNIFER CABRAL** was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss there from.

23. That as a result of the foregoing, Plaintiff was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

24. That by reason of the foregoing, Plaintiff **JENNIFER CABRAL** was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff(s) demand(s) judgment against the Defendants herein on all causes of action, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: New York, New York
January 13, 2020

Yours, etc.


TEPERMAN & TEPERMAN, LLC.

Attorneys for Plaintiff

JENNIFER CABRAL

15 East 40th Street, Suite 800

New York, NY 10016

(212) 725-2313

ATTORNEY VERIFICATION

STATE OF NEW YORK)

COUNTY OF NEW YORK)

BRUCE R. TEPERMAN an attorney admitted to practice in the State of New York, affirms the following to be true under the penalties of perjury:

1. I am an associate of TEPERMAN AND TEPERMAN, LLC, attorneys for the plaintiffs in the within action.

2. I have read the foregoing Verified complaint and know the contents thereof.

3. The same is true to my own knowledge except as to the matters therein alleged upon information and belief and as to those matters, I believe it to be true.

4. The reason why this Verification is made by me and not the Plaintiff is that the Plaintiff resides in a County other than the county wherein I maintain my office.

5. The grounds of my belief as to all matters not stated upon my knowledge are as follows: Conversations with Plaintiff and others; official documents; my file and other good and sufficient sources.

Dated: New York, New York
January 9, 2020


BRUCE R. TEPERMAN

Index No.: Year 2020 E

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

JENNIFER CABRAL,

Plaintiff(s),

-against-

DOLLAR TREE, INC.,

Defendant(s),

SUMMONS & VERIFIED COMPLAINT

Law Offices
TEPERMAN & TEPERMAN, LLC.

Attorney's for Plaintiff(s)

JENNIFER CABRAL

15 EAST 40 Street, Suite 800

New York, New York 10016

Tel. No. (212) 725-2313

Fax No. (212) 725-2319

Pursuant to 22 NYCRR 130.1.1, the undersigned, an attorney admitted to practice law in the courts of New York State, Certifies upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated:

Bruce R. Teperman, Esq.

Service of a copy of the within is hereby admitted.

Dated:

Attorney (s) for

PLEASE TAKE NOTICE

- ☐ that the within is a (certified) true copy of a _____ entered in the office of the clerk of the within named Court on _____, 2020.
- ☐ that an Order of which the within is a true copy will be presented for settlement to the Hon. _____ one of the judges of the within named Court, at _____ on _____, 2020, at _____ am/pm.

Dated: _____

Attorney for
Office Address & Tel No.:

To:

Attorney(s) for:

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